

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

IN RE PAYMENT CARD INTERCHANGE  
FEE AND MERCHANT DISCOUNT  
ANTITRUST LITIGATION

No. 05-MD-1720 (MKB) (JAM)

ORAL ARGUMENT REQUESTED

**DEFENDANT VISA INC.'S NOTICE OF  
MOTION TO ENFORCE THE RULE 23(B)(3) CLASS SETTLEMENT  
AGREEMENT AND FINAL JUDGMENT BY COMPELLING  
RULE 23(B)(3) CLASS MEMBERS TO DISMISS RELEASED CLAIMS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Enforce the Rule 23(b)(3) Class Settlement Agreement and Final Judgment by Compelling Rule 23(b)(3) Class Members to Dismiss Released Claims and accompanying Exhibit A hereto, the undersigned will move this Court on a date and time to be designated by the Court, in the United States Courthouse, 225 Cadman Plaza East, Brooklyn, NY 11201-1818 for an Order and Injunction pursuant to the All-Writs Act, 28 U.S.C. § 1651 and this Court's inherent authority to enforce the Rule 23(b)(3) Class Settlement Agreement (Dkt. 7257-2) and the Court's Rule 23(b)(3) Class Settlement Order and Final Judgment (Dkt. 7832) and to compel the plaintiffs in the Consolidated Class Amended Complaint (Dkt. 38) in *In re Visa Debit Card Antitrust Litigation*, No. 1:24-cv-07435 (S.D.N.Y.) ("Plaintiffs") to dismiss Plaintiffs Yabla, Inc. and R&N Productions LLC d/b/a SewRobOnE from the Consolidated Class Action Complaint and to amend its proposed class definition to exclude entities that accepted Visa- or Mastercard-branded cards prior to January 25, 2019, and for such other further relief as the Court deems just and proper.

Dated: March 28, 2025

Respectfully submitted,

**ARNOLD & PORTER KAYE SCHOLER  
LLP**

/s/ Matthew A. Eisenstein

Anne P. Davis  
Matthew A. Eisenstein  
Rosemary Szanyi  
601 Massachusetts Avenue, NW  
Washington, DC 20001-3743  
202) 942-5000  
anne.davis@arnoldporter.com  
matthew.eisenstein@arnoldporter.com  
Rosemary.Szanyi@arnoldporter.com

Robert J. Vizas  
Three Embarcadero Center, 10th Floor  
San Francisco, CA 94111-4024  
(415) 471-3100  
robert.vizas@arnoldporter.com

**HOLWELL SHUSTER & GOLDBERG LLP**

Michael S. Shuster  
Demian A. Ordway  
Blair E. Kaminsky  
425 Lexington Avenue  
New York, NY 10017  
(646) 837-5151  
mshuster@hsgllp.com  
dordway@hsgllp.com  
bkaminsky@hsgllp.com

*Counsel for Defendant Visa Inc.*

### **CERTIFICATE OF SERVICE**

I hereby certify that on March 28, 2025, I caused a true and correct copy of the foregoing to be served on all counsel of record in the above-referenced action via Lexis Nexis File&Serve, and via email on Plaintiffs' counsel in *In re Visa Debit Card Antitrust Litigation*, No. 1:24-cv-07435 (S.D.N.Y.), in accordance with the parties' prior agreement.

/s/ Matthew A. Eisenstein  
Matthew A. Eisenstein